

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
Country Code 1 ENUM, LLC)
Petition for Limited Waiver of) CC Docket No. 99-200
Section 52.15(g)(2)(i) of the)
Commission’s Rules Regarding Access to)
Numbering Resources)

**REPLY OF COUNTRY CODE 1 ENUM, LLC TO COMMENTS
OF TELCORDIA TECHNOLOGIES, INC. ON PETITION FOR LIMITED WAIVER**

Country Code 1 ENUM Limited Liability Company (“ENUM LLC”) hereby replies to the comments of Telcordia Technologies, Inc. (“Telcordia Comment”) regarding ENUM LLC’s petition for a limited waiver of section 52.15(g) of the Commission’s numbering rules (the “Petition”) in connection with the planned trial of end user ENUM within the Country Code 1 North American Numbering Plan.

ENUM LLC gratefully acknowledges Telcordia’s “strong[] support [for] making number resources available for and [for the] conduct of a public ENUM trial.” (Telcordia Comment, p. 1.) The remainder of this Reply demonstrates that the Petition as drafted fully addresses each of the concerns raised in the Telcordia Comment.

1. The Petition Does Not Request Temporary Assignment of Numbering Resources Directly to ENUM LLC.

The Telcordia Comment states that “assignment of numbers to the ENUM LLC for reassignment to participating [service providers] raises significant concern” and recommends that “numbers not be provided to the ENUM LLC itself” because ENUM LLC does not qualify for allocation of numbering resources under current Rules. (Telcordia Comment, pp. 1, 3). With

these comments, the Telcordia Comment implies that the Petition seeks direct assignment of numbering resources to ENUM LLC itself. That implication is incorrect. ENUM LLC is not requesting assignment of numbering resources to itself.

Instead, the procedures proposed in the Petition contemplate that ENUM LLC will function as a “gatekeeper” for trial numbering requests from service providers who have signed the Memorandum of Understanding and plan to participate in the trial. As Telcordia points out, and as the Petition previously noted, ENUM LLC does not qualify for allocation of numbering resources. (Telcordia Comment, p. 3; Petition, pp. 4-5.) However, the September 2, 2005 letter from Ambassador David A. Gross, U.S. Coordinator for International Communications and Information Policy, United States to Department of State (Exhibit 1 to the Petition) charges ENUM LLC with responsibility for use of numbering resources during the trial of end user ENUM.

In order to fulfill this condition¹ without necessitating direct assignment of numbers to ENUM LLC itself, ENUM LLC has proposed a procedure pursuant to which it will review requests for numbering resources by participants in the trial. After review, ENUM LLC will submit the requests for resources, but numbering blocks will then be *assigned directly to participating service providers under existing arrangements*. The proposed procedures are detailed in Exhibit 11 to the Petition. The proposed procedures demonstrate that the Petition does not request direct assignment of numbering resources to ENUM LLC at any time.

¹ ENUM LLC agreed to the conditions set out in Ambassador Gross’s letter in a letter dated September 30, 2005. That letter was attached as Exhibit 2 to the Petition.

2. The Proposed Procedures Involve All Trial Participants in the *Temporary* Assignment of Numbering Resources

It is important to emphasize that to the extent the allocation procedures detailed in Exhibit 11 confer any “administrative” role on ENUM LLC, that role is limited, necessitated by the “terms and conditions” of the letter from Ambassador Gross, and *temporary*. Critically, the proposed procedures confer substantial responsibility on the entities that have agreed to participate in the public end user trial. Participants in the trial of end user ENUM – there are currently 13 – together form a Trial Participants Advisory Committee, which is referred to in the Memorandum of Understanding and in Exhibit 11 to the Petition as the “TPAC.” The proposed procedures envision a substantial role for the TPAC.

Although the LLC will have responsibility for finalizing numbering requests and submitting them to the Pooling Administrator, all requests will be initially reviewed by the TPAC, which will make the preliminary determination of the rate centers in which numbering resources are required. Moreover, trial participants will direct numbering requests to the TPAC, and the TPAC will be responsible for ensuring that numbering requests are forwarded to the appropriate participating carrier. The involvement of the TPAC ensures that all participants will be aware of decisions regarding assignment of numbering resources, and moreover that all participants will have input into such decisions.

Importantly, any allocation of numbering resources pursuant to the requested waiver will be temporary and will be limited in duration to the length of the trial. (Petition, pp. 5, 8, and Ex. 11.) To the extent that the Telcordia Comment expresses a concern about “neutrality” and possible conflicts of interest in the number assignment process (Telcordia Comment p. 3), that concern appears to be predicated on a misunderstanding that trial numbering resource allocations will be long term, rather than of limited duration. For example, the Telcordia Comment suggests

that any grant of resources be conditioned on their return at the end of the trial. Return of numbering resources at the end of the trial is, of course, quite acceptable to the LLC, and is specifically contemplated in the Petition, as noted above. In short, the proposed procedures outlined in the Petition establish a fair process that involves all trial participants in the temporary assignment of numbering resources.

3. The Trial of End User ENUM Described in the Petition Will Not Encompass Carrier or Infrastructure ENUM.

The Telcordia Comment expresses concern that it is important for the trial to “be limited to public end user ENUM, and not encompass carrier or infrastructure ENUM.” (Telcordia Comment, pp. 2-3.) Of course, as Telcordia itself acknowledges, this limitation has already been made an express condition of the trial. Condition 6 of the September 6, 2005 Ambassador Gross letter (Exhibit 1 to the Petition) requires that “[t]he ENUM LLC will not permit the testing of carrier or infrastructure ENUM in e164.arpa during the trial period.” ENUM LLC has already agreed to comply with this condition. (See Petition Exhibit 2). Thus, as ENUM LLC looks to the future, it has already committed that any trial work it performs with respect to carrier or infrastructure ENUM will not use trial numbers allocated for use in the end user ENUM trial that is the subject of the present Petition, and will not involve activities in the e164.arpa domain. Accordingly, ENUM LLC has no objection to having the condition in Ambassador Gross’s letter restated in any grant of its Petition.

In addition, ENUM LLC wishes to re-emphasize its ongoing commitment to neutrality . For example, membership in ENUM LLC is open to all persons that 1) have a material interest in ENUM; 2) are not prohibited by the laws of the United States or other nations within Country Code 1 from joining; and 3) are prepared to fulfill the requirements of ENUM LLC’s Operating Agreement. The Operating Agreement promotes neutrality by prohibiting ENUM LLC from

entering into any vendor relationship with one of its own members. In addition, ENUM LLC's Technical Advisory Committee has developed documents setting forth the technical and operational requirements for an ENUM Tier 1A Registry for Country Code 1 (CC1) under the ITU-T E.164 international numbering standard and the technical and operational requirements for ENUM Tier 1B Registry components for Numbering Plan Area resources within the U.S. Participation in the Technical Advisory Committee is open to non-members of ENUM LLC and has in fact included representatives of many companies – including Telcordia –that have not joined ENUM LLC.² The ENUM Forum, which developed the framework document (see exhibit 4 of the Petition) on which the end user trial is based, is similarly open to non-members of ENUM LLC; indeed, there are currently 19 voting members and the Forum is presently chaired by a Telcordia employee.

4. Conclusion

In conclusion, ENUM LLC reiterates its appreciation for Telcordia Technology, Inc.'s support of the planned trial of end user ENUM and its support for the request for access to numbering resources in the conduct of the trial. As the foregoing demonstrates, all of the potential concerns identified in Telcordia's Comment have been previously considered and

² At the time the technical and operational requirements relating to Tier 1A were completed, membership in the Technical Advisory Committee included representatives of the following non-members of ENUM LLC: 1-800 AFTA; AG Design LLC; Bell Canada; BT Americas; CIRA; Cisco; Comcast; COX; ICB; Lucent; NeuStar; Nominum; Telcordia; Verisign. At the time the technical and operational requirements relating to Tier 1B were completed, non-members of ENUM LLC who participated in the Technical Advisory Committee included representatives of the following entities: 1-800 AFTA; 800 Response Marketing LLC; AG Design, LLC; BellSouth; BT Americas; CIRA; COX; Evolving Systems; ICB; NeuStar; Telcordia; Verisign;

addressed by ENUM LLC in the body of the Petition and in the detailed attachments that accompanied the Petition.

Accordingly, ENUM LLC respectfully reaffirms its request that the Wireline Competition Bureau expeditiously grant ENUM LLC's Petition for a waiver of section 52.15(g) of the Commission's rules so as to allow access to numbering resources in conjunction with the planned trial of end user ENUM.

Respectfully Submitted,

By: 

Katherine R. Blanchette

Lino S. Lipinsky de Orlov

Jacqueline A. Henson

Attorneys for COUNTRY CODE 1 ENUM LLC
McKenna Long & Aldridge LLP
1875 Lawrence Street, Suite 200
Denver, CO 80202
303.634.4000 (T)
303.634.4400 (F)

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